

1 Honorable Ricardo S. Martinez
2
3
4
5
6

7
8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 UNITED STATES OF AMERICA,) Case No. 2:18-cv-00045-RSM
12 Plaintiff,)
13 v.) **ORDER GRANTING UNITED
14) STATES' MOTION FOR SUMMARY
Defendant.) JUDGMENT**
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)

Upon consideration of the United States' Motion for Summary Judgment, and any response and reply thereto, the Court finds that for reasons stated in the United States' Motion, there is no genuine dispute of material fact, and the United States is entitled to judgment as a matter of law. Accordingly, the United States' Motion is hereby GRANTED.

The Clerk of the Court is directed to enter judgment against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, as follows:

Judgment is hereby entered in favor of the United States and against the Estate of Dennis J. Johnson and Jody Ann Fitts, as Personal Representative of the Estate of Dennis J. Johnson, for

1 unpaid federal income tax liabilities for the years 2008 through 2012 in the amount of
2 \$498,706.40, plus interest and other statutory additions accruing from June 18, 2021 as provided
3 by law under 28 U.S.C. § 1961(c) and 26 U.S.C. §§ 6601, 6621, and 6622.

4 IT IS SO ORDERED.

5 DATED this 22nd day of July, 2021.

6
7 
8

9 RICARDO S. MARTINEZ
10 CHIEF UNITED STATES DISTRICT JUDGE
11
12

13 Presented by:

14 DAVID A. HUBBERT
15 Acting Assistant Attorney General

16 /s/ Jennifer Y. Golden
17 JENNIFER Y. GOLDEN
18 Trial Attorney, Tax Division
19 U.S. Department of Justice
P.O. Box 683, Ben Franklin Station
Washington, D.C. 20044
Tel: (202) 307-6547
Fax: (202) 307-0054
Jennifer.Y.Golden@usdoj.gov

20 *Attorneys for the United States of America*
21
22
23
24